

Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PUBLIC INQUIRY CONCERNING
THE TERMS OF 39 U.S.C. § 404(d)

Docket No. PI2016-2

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS
(February 22, 2016)**

The United States Postal Service hereby moves that the Postal Regulatory Commission extend the deadline for the filing of reply comments in this docket from March 1, 2016 to March 29, 2016, for the reasons stated below.

Order No. 3054 set March 1, 2016 as the deadline for reply comments from interested parties regarding the scope of the Commission's appellate authority over relocations and rearrangements of postal retail facilities and the closure or consolidation of Contract Postal Units (CPUs). The Postal Service has recently received a number of Chairman's Information Requests in Docket ACR2015, requiring quick production of detailed information pertaining to its Annual Compliance Review and its Annual Report filings. The Postal Service has therefore devoted its efforts and resources to providing responses to these requests. In light of the demands of the ACR docket, the Postal Service believes that an extension of twenty (20) business days in Docket No. PI2016-2 is appropriate to adequately consider parties' initial comments, prepare reply comments, and allow Postal Service management sufficient opportunity for review prior to filing.

The Postal Service has consulted with the Public Representative for this matter on the requested extension. The Postal Service has been authorized to represent that the Public Representative does not oppose the Postal Service's request for an extension. The Postal Service has also made efforts to contact each commenter. With the exception of one individual,¹ the Postal Service has successfully contacted all other parties who have filed comments in this docket. All other parties have indicated that they do not object to the proposed March 29 extension date for the filing of reply comments. This date would apply to all interested parties.

The Postal Service does not consider that any party will be prejudiced by the Commission's approval of this request. Accordingly, the Postal Service respectfully requests that this motion be granted, and that the date for filing reply comments by any and all parties be extended to March 29, 2016.

Respectfully submitted,

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February 22, 2016

¹ Despite repeated attempts, the Postal Service has been unable to contact Elaine Mittleman to advise of its requested extension date and learn whether she would oppose the request.